

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

IN RE:	§	(CHAPTER 11)
	§	
DUNE ENERGY, INC.;	§	CASE NUMBER 15-10336
DUNE OPERATING COMPANY;	§	CASE NUMBER 15-10337
DUNE PROPERTIES, INC.	§	CASE NUMBER 15-10338
	§	
JOINTLY ADMINISTERED DEBTORS.	§	(JOINT ADMINISTRATION
	§	REQUESTED)

**AGENDA FOR HEARING ON FIRST DAY MOTIONS
SCHEDULED ON MARCH 10, 2015**

The following matters are scheduled to be heard by the Honorable H. Christopher Mott on Tuesday, March 10, 2015:

- (a) Debtor's Emergency Ex-Parte Motion for Joint Administration [Dune Energy, Inc., Case No. 15- 15-10336-hcm, Docket No. 2];
- (b) Debtor's Emergency Ex-Parte Motion for Joint Administration [Dune Operating Company, Case No. 15-15-10337-hcm, Docket No. 3];
- (c) Debtor's Emergency Ex-Parte Motion for Joint Administration [Dune Properties, Inc., Case No. 15- 15-10338-hcm, Docket No. 3];
- (d) Notice of Designation as Complex Chapter 11 Bankruptcy Case [Docket No. 3]
- (e) Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing and to Use Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Parties, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief (the "DIP Motion") [Docket No. 13];
- (f) Debtors' Emergency Motion to Extend Deadline to File Schedules of Assets and Liabilities, Schedule of Executory Contracts, and Statement of Financial Affairs (the "Schedules Motion") [Docket No. 6];
- (g) Debtors' Emergency Motion for an Order (I) Authorizing Continued Use of Existing Business Forms and Records; (II) Authorizing Maintenance of Existing Corporate Bank Accounts and Cash Management System; and (III) Waiving Certain U.S. Trustee Requirements (the "Cash Management Motion") [Docket No. 7];

- (h) Debtors' Emergency Motion for Order Authorizing the Debtors to (I) Pay Certain Prepetition Wages, Other Compensation and Reimbursable Employee Expenses and (II) Continue Employee Benefits Programs (the "Employee Benefits Motion") [Docket No. 8];
- (i) Debtors' Emergency Motion for an Order Under 11 U.S.C. §§ 105(a) and 366 (i) Prohibiting Utility Companies from Altering or Discontinuing Service on Account of Prepetition Invoices, (ii) Approving Deposit Account as Adequate Assurance of Payment, and (iii) Establishing Procedures for Resolving Requests by Utility Companies for Additional Adequate Assurance of Payments (the "Utilities Motion") [Docket No. 9];
- (j) Debtors' Emergency Motion for an Order Under 11 U.S.C. §§ 105(a) and 363(c) Authorizing the Debtors to (I) Continue their Insurance Policies and Bond Obligations and (II) Pay Insurance Premiums, Bond Payments and Financing Payments Thereon (the "Insurance Motion") [Docket No. 10];
- (k) Debtors' Emergency Motion for an Order, Pursuant to Sections 105(a) and 363(b) of the Bankruptcy Code, (I) Authorizing the Debtors to Pay Certain Prepetition Obligations on Account of Royalties, Overriding Royalty Interests, Working Interest Owner Payments, and Severance Taxes and (II) Authorizing Banks to Honor and Process Related Checks and Electronic Transfers (the "Royalties Motion") [Docket No. 11];

Dated: March 10, 2015

Respectfully submitted,

HAYNES AND BOONE, LLP

/s/ Charles A. Beckham, Jr.

Charles A. Beckham, Jr.

Texas Bar No. 02016600

Kenric D. Kattner

Texas Bar No. 11108400

Kourtney Lyda

Texas Bar No. 24013330

Kelli Stephenson

Texas Bar No. 24070678

1221 McKinney Street, Suite 2100

Houston, Texas 77010

Telephone: (713) 547-2000

Fax: (713) 547-2600

Email: charles.beckham@haynesboone.com

Email: kenric.kattner@haynesboone.com

**PROPOSED COUNSEL TO
DEBTORS-IN-POSSESSION**